

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FEDERATED LIFE INSURANCE
COMPANY,

Plaintiff,

vs.

DAMON JOANIS; and ELIZABETH
PABEN, as Personal Representative for the
Estate of Elenya Herring,

Defendants

No. 2:23-cv-01726 RSM

**STIPULATION AND ORDER TO
BRIEFLY EXTEND DEADLINE FOR
DEFENDANT DAMON JOANIS TO
ANSWER THE COMPLAINT AND TO
EXTEND OTHER PRELIMINARY
CASE DEADLINES**

**NOTE ON MOTION CALENDAR:
MARCH 6, 2024**

Pursuant to Western District of Washington Local Civil Rule 10(g), the parties, through their undersigned attorneys, stipulate and move as follows:

I. STIPULATION

The parties hereby stipulate and agree to extend the time for Defendant Joanis to file his Answer to Federated Complaint to March 18, 2024.

In addition, this Court recently granted a brief extension of the deadlines for Initial Disclosures and filing of the Joint Status Report and Discovery Plan. The deadline for Initial Disclosures is now March 18—the same day that Joanis’ Answer would be due if this stipulated motion is granted.

Joanis has informed Federated Life Insurance Company (“Federated”) that he intends to include counter-claims against Federated with his Answer. In order to allow Federated sufficient time to review the anticipated crossclaims and prepare its Initial Disclosures accordingly, the parties

1 agree to the deadline of April 1, 2024, for exchanging Initial Disclosures, and the deadline of April
2 8, 2024, for the parties to file the Joint Status Report and Discovery Plan.

3 DATED this 6th day of March 2024.

4 LETHER LAW GROUP

5 /s/ Kevin J. Kay

6 Kevin J. Kay, WSBA #34546
1848 Westlake Avenue N, Suite 100
7 Seattle, WA 98109
P: (206) 467-5444/F: (206) 467-5544
8 kkay@letherlaw.com
Counsel for Defendant Damon Joanis

9 BULLIVANT HOUSER BAILEY PC

10 /s/ Matthew J. Sekits

11 Matthew J. Sekits, WSBA #26175
925 Fourth Avenue, Suite 3800
12 Seattle, WA 98104
direct 206.521.6452 / main 206.292.8930
13 matthew.sekits@bullivant.com
Counsel for Plaintiff Federated Life Insurance
14 *Company*

15 HOLMQUIST & GARDINER PLLC

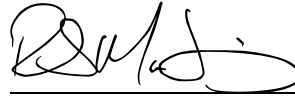
16 /s/ Hamilton Harcourt Gardiner

17 Hamilton H Gardiner, WSBA #37827
1000 Second avenue Suite 1770
Seattle, WA 98122
18 P: (206) 438-9083/ F: (206) 694-4601
hamilton@lawhg.net
19 *Attorney for Elizabeth Paben as Personal*
20 *Representative for the Estate of Elenya Herring*

ORDER

IT IS SO ORDERED.

DATED this 7th day of March, 2024.



RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE

Presented by:

LEATHER LAW GROUP

/s/ Kevin J. Kay

Kevin J. Kay, WSBA #34546
1848 Westlake Avenue N, Suite 100
Seattle, WA 98109
P: (206) 467-5444/F: (206) 467-5544
kkay@letherlaw.com
Counsel for Defendant Damon Joanis

BULLIVANT HOUSER BAILEY PC

/s/ Matthew J. Sekits

Matthew J. Sekits, WSBA #26175
925 Fourth Avenue, Suite 3800
Seattle, WA 98104
direct 206.521.6452 / main 206.292.8930
matthew.sekits@bullivant.com
Counsel for Plaintiff Federated Life Insurance Company

HOLMQUIST & GARDINER PLLC

/s/ Hamilton Harcourt Gardiner

Hamilton H Gardiner, WSBA #37827
1000 Second avenue Suite 1770
Seattle, WA 98122
P: (206) 438-9083/ F: (206) 694-4601
hamilton@lawhg.net
Attorney for Elizabeth Paben as Personal Representative for the Estate of Elenya Herring

CERTIFICATE OF SERVICE

The undersigned hereby certifies under the penalty of perjury under the laws of the United States of America that on this date I caused to be served in the manner noted below a true and correct copy of the foregoing on the parties mentioned below as indicated:

Matthew J. Sekits
Bullivant Houser Bailey PC
925 Fourth Avenue Suite 3800
Seattle, WA 98104
matthew.sekits@bullivant.com

Hamilton H Gardiner
Holmquist & Gardiner PLLC
1000 Second avenue Suite 1770
Seattle, WA 98122
P: (206) 438-9083/ F: (206) 694-4601
hamilton@lawhg.net

By: ☐ First Class Mail ☒ ECF/Email ☐ Legal Messenger

Dated this 6th day of March 2024 at Seattle, Washington.

/s/ Devon Sheehan
Devon Sheehan | Paralegal